

# Exhibit 34

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY LITIGATION

MDL No. 16-2738 (FLW)(LHG)

THIS DOCUMENT RELATES TO:

ANNA GALLARDO,

)

)

)

Plaintiffs,

)Case No. 3:18-cv-10840

v.

)

)

JOHNSON & JOHNSON, et al.,

)

)

Defendants.

)

TUESDAY, JANUARY 12, 2021

Remote Oral Deposition of ANNA GALLARDO, taken pursuant to notice and conducted at the location of the witness in the State of Missouri, commencing at 8:30 a.m. Central Time, on the above date, before Jennifer A. Dunn, Registered Professional Reporter, Certified Court Reporter.

GOLKOW LITIGATION SERVICES  
877.370.3377 ph | 917.591.5672 fax  
deps@golkow.com

A P P E A R A N C E S

COUNSEL ON BEHALF OF PLAINTIFF:

ONDER LAW FIRM

BY: CYNTHIA GARBER, ESQUIRE

110 E. Lockwood Avenue

St. Louis, Missouri 63119

Tel: 314.408.6136

garber@onderlaw.com

COUNSEL ON BEHALF OF DEFENDANT:

SHOOK HARDY & BACON, LLP

BY: LORI MCGRODER, ESQUIRE

2555 Grand Boulevard

Kansas City, Missouri 64108

Tel: 816.474.6550

lmcgroder@shb.com

1 type of surgical procedures?

2 A No.

3 Q Have you ever been diagnosed with any autoimmune  
4 condition?

5 A No.

6 Q Like rheumatoid arthritis?

7 A No, I'm sorry.

8 Q Okay. Have you ever been diagnosed with  
9 Peutz-Jeghers syndrome?

10 A I'm not sure what that is, I don't think so.

11 Q Okay. Have you ever been involved in any other  
12 lawsuits, other than this one?

13 A No.

14 Q I have to ask, have you ever been charged with a  
15 felony?

16 A No.

17 Q I didn't think so.

18 How did you hear about an alleged connection  
19 between ovarian cancer and Johnson's Baby Powder?

20 A It was a verdict that was publicized the early  
21 part of 2016.

22 Q And where did you hear about a publicized verdict  
23 in 2016?

24 A On the television, news.

25 Q What TV news was it?

1           A     It could have been a number of them. I watch  
2     different channels. I watch, you know, FOX, it could have  
3     been on NBC, CBS, I don't remember.

4           Q     And what was the nature of the information  
5     provided in that program?

6           A     That the jury concluded that Johnson & Johnson  
7     Baby Powder caused the woman's ovarian cancer.

8           Q     Did it talk about a verdict?

9           A     The verdict, that -- that -- she was -- won the  
10    case.

11          Q     Did it talk about how much money she was awarded?

12          A     I'm sure they did, but I don't recall the amount.

13          Q     Was that the first time that you had ever heard of  
14    allegations that -- that ovarian cancer could be caused by  
15    Johnson's Baby Powder?

16          A     Yes, that was the first time.

17          Q     At any point prior to that had you ever seen  
18    lawyer advertising on TV about talc lawsuits?

19          A     No, this was the first time that I was aware of  
20    it.

21          Q     And how are you sure it was the first time you  
22    were aware of it?

23          A     I just remember that it entered my mind that this  
24    could be a possibility link of my ovarian cancer.

25          Q     Did you tell anyone that you had seen that news

1 effects?

2 MS. MCGRODER: Object to the form.

3 THE WITNESS: That's exactly right, yes.

4 BY MS. GARBER:

5 Q In other words, the risks were not worth it to  
6 you?

7 A Not at all.

8 MS. MCGRODER: Object to form. Leading.

9 BY MS. GARBER:

10 Q I want to speak to you about Johnson's Baby Powder  
11 for a bit.

12 Why did you specifically buy Johnson & Johnson's  
13 Baby Powder as opposed to other brands?

14 A I trusted Johnson & Johnson. I would look at  
15 their ads, they would talk about it being effective and  
16 safe. Again, I liked the smell of it for, you know, for  
17 hygiene. And I thought it was a good brand.

18 I never really ever did generic branding, I  
19 always, you know, used the label. The label was important  
20 to me and the company that I trusted.

21 Q Counsel asked you about the bottle of Johnson's  
22 Baby Powder. Did you ever read the print on the back of the  
23 bottle?

24 A Yes, I would occasionally look at the print on the  
25 back of the bottle, yes.

1           Q     And while you were using the product and looking  
2     at the print on the back of the bottle, did you ever see a  
3     warning with regard to the risk of use associated with  
4     ovarian cancer?

5                     MS. MCGRODER:   Object to form.

6                     THE WITNESS:   Yes, I would look at the -- I  
7     would look at the label. I never ever saw any type of  
8     warning for ovarian cancer.

9                     Had I seen it, I would have stopped it  
10    immediately.

11   BY MS. GARBER:

12           Q     Thank you. You were asked about your treatment  
13    for ovarian cancer and you underwent chemo for about six  
14    months; is that correct?

15           A     Four months. It was six rounds, every three  
16    weeks.

17           Q     Sorry, I misspoke. I miswrote, actually, in my  
18    notes.

19                     So you underwent six rounds of chemotherapy; is  
20    that right?

21           A     Yes.

22           Q     I want to talk to you a bit about your diagnosis.  
23                     Do you recall how you learned that you had ovarian  
24    cancer?

25           A     Yes.